

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, and TERRENCE DRAIN on behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

**BILL OLDHAM**, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; **ROBERT MOORE**, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; **CHARLENE MCGHEE**, in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee; **DEBRA HAMMONS**, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; **SHELBY COUNTY, TENNESSEE**, a Tennessee municipality; and **TYLER TECHNOLOGIES, INC.**, a foreign corporation

DEFENDANTS.

**Case No. 2:16-cv-2907-SHM-tmp**

(Hon. Judge Samuel H. Mays)

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE CIVIL  
RIGHTS ACT OF 1871, 42 U.S.C. §  
1983, AND TENNESSEE COMMON  
LAW**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV. PRO.  
38(a) & (b)**

MELVIN INGRAM et al., on behalf of  
themselves and all similarly situated  
persons,

PLAINTIFFS,

v.

BILL OLDHAM, in his individual capacity  
and in his official capacity as the Sheriff of  
Shelby County, Tennessee; ROBERT  
MOORE, in his individual capacity and in  
his official capacity as the Jail Director of  
the Shelby County, Tennessee;  
CHARLENE McGHEE, in her individual  
capacity and in her official capacity as the  
of Assistant Chief Jail Security of Shelby  
County, Tennessee; DEBRA HAMMONS,  
in her individual capacity and in her  
official capacity as the Assistant Chief of  
Jail Programs of Shelby County,  
Tennessee; SHELBY COUNTY,  
TENNESSEE, a Tennessee municipality;  
and TYLER TECHNOLOGIES, INC., a  
foreign corporation

DEFENDANTS.

**Case No. 2:17-cv-02795-SHM-tmp**

(Hon. Judge Samuel H. Mays)

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE CIVIL  
RIGHTS ACT OF 1871, 42 U.S.C. §  
1983, AND TENNESSEE COMMON  
LAW**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R. CIV. PRO.  
38(a) & (b)**

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT OF *POWELL*  
PLAINTIFFS FOR LEAVE TO FILE A REPLY MEMORANDUM IN SUPPORT  
OF PLAINTIFFS' RULE 23(g)(3) MOTION FOR APPOINTMENT OF INTERIM  
CLASS COUNSEL AND IN SUPPORT OF PLAINTIFFS' REQUEST FOR THE  
COURT TO CONSIDER AND RULE ON THEIR PREVIOUSLY FILED RULE  
23(G)(3) MOTION FOR APPOINTMENT OF INTERIM CLASS COUNSEL IN  
ORDER THAT, *INTER ALIA*, A CONSOLIDATED CLASS COMPLAINT MAY  
BE FILED**

Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy Melton, Issacca Powell, Keith Burgess and Terrence Drain (hereinafter collectively referred to as “*Powell* Plaintiffs”) , without objection or opposition from the *Ingram* Plaintiffs, respectfully request that this Court grant them leave to file a Reply Memorandum in Support of their Rule 23(g)(3) Motion for Appointment of Interim Class Counsel (Dkt. No. 80) (the “Motion”) and in Support of their Request for the Court to Consider and Rule on their Previously filed Rule 23(g)(3) Motion for Appointment of Interim Class Counsel in Order that, *inter alia*, a Consolidated Class Complaint May Be Filed (Dkt. No. 93) (the “Renewed Motion”) and would state as follows:

1. On June 21, 2018, the *Ingram* Plaintiffs filed their “Response to *Powell* Plaintiffs’ Renewed Motion to Appoint Interim Class Counsel.”
2. Under Local Rule 7.2(c), a party may file a reply memorandum only with leave of the Court by moving for leave within 7 days of service of the response.
3. The *Powell* Plaintiffs’ request for leave to file a reply is thus proper, in view of other factors supporting the necessity for further briefing, as enumerated in the Proposed Reply Memorandum, attached hereto as **EXHIBIT A**.
4. On June 27, 2018, counsel for the *Powell* Plaintiffs conferred with counsel for the *Ingram* Plaintiffs, who indicated that the *Ingram* Plaintiffs consent to the instant request for leave to file a Reply Memorandum.

In light of the foregoing, the *Powell* Plaintiffs respectfully request that the Court grant their request for leave to file a Reply Memorandum.

Respectfully submitted,

s/ Michael G. McLaren

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William E. Cochran, Jr. (#21428)

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s/ William E. Routt

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*Counsel for Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy Melton, Issacca Powell, Keith Burgess and Terrence Drain on behalf of themselves and the absent Class Members*

**CERTIFICATE OF CONSULTATION**

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned counsel for the *Powell* Plaintiffs consulted by electronic mail with Daniel Lofton and Matt Gulotta, counsel for the *Ingram* Plaintiffs, on June 27, 2018. Messrs. Lofton and Gulotta indicated that the *Ingram* Plaintiffs consent to the *Powell* Plaintiffs' request for leave to file a reply memorandum.

s/William E. Routt

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William E. Routt

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that the above and foregoing was filed on June 28, 2018, using the CM/ECF system with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court to the following parties and/or served via U.S. Mail postage pre-paid and by email:

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/s/ William E. Routt  
William E. Routt